

FILED *C*

JUN 03 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
FOR THE NINTH CIRCUIT

M.S., D.S., P., R.R., A.L.R.,
CALIFORINA COALITION OF WOMEN
PRISONERS, PRECIADO

PLAINTIFF

V.

UNITED STATES OF AMERICA, FEDERAL
CORRECTIONAL INSTITUTION,
JOHN RUSSELL BELLHOUSE.

DEFENDANT

CASE NUMBER:

4:2022-CV-08924

4:2022-CV-09096

4:2023-CV-02668

4:2023-CV-05356

4:2023-CV-04155

4:2024-CV-01980

4:2024-CV-01360

year

year

NC
MOTION FOR APPOINTMENT
OF COUNSEL

COMES NOW, JOHN RUSSELL BELLHOUSE, The defendant in the
above styled cases, petitioning this honorable court to
appoint legal counsel, based on the following reasons;

1. The defendant is unable to afford counsel. In the
defendant's prior criminal case, the court ruled he was
indigent.

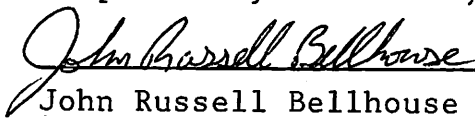
2. The issues involved in these cases are complex. As of
this date, five (5) cases have been consolidated under
one case. Two (2) additional cases may be added in the
future.

3. In "exceptional circumstances", a district court may appoint counsel for indigent civil litigants. The defendant has no legal background and would be unable to articulate the complexity of the legal issues involved, in these consolidated lawsuits. These cases will require the expertise of a well qualified attorney that would be able to conduct extensive documentary discovery, conduct depositions of all parties involved, plus of other unknown witnesses connected to the cases, etc. The plaintiffs have requested a jury trial, which requires much greater legal skill than the defendant has or can develop.

(Nunn v. Certified Officers 2023 9th Cir. USD LEXIS 217864
Rand v. Rawland 113 F.3d 1520, 1977, US APP LEXIS 12798,
Aldabe v. Aldabe, 616 F.2d 1089, 1093, (9th Cir. 1980),
Wilborn, 789 F.2d at 1331 (quoting Weygandt v. Look, 718 F.2d 952, 954 (9th Cir. 1983), Solis v. County of Los Angeles, 514 F.3d 946, 958, (9th Cir. 2008)).

WHEREFORE, the defendant's motion for appointment of counsel should be granted. Pursuant to 20 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,


John Russell Bellhouse

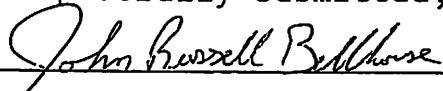
CERTIFICATE OF SERVICE

On May 23, 2024, I submitted the foregoing Motion for Appointment of Counsel by first class mail to the Clerk of the Court for the 9th District, Northern District of California. Additionally, this motion has been mailed to the following:

The Pride Law Firm
2831 Camino Del Rio South
Suite 104
San Diego, CA 92108

These documents were mailed in accordance with the PRISON MAILBOX RULE on the date listed below.

Respectfully submitted,



John Russell Bellhouse

May 23, 2024

Date:

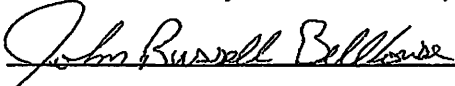
CERTIFICATE OF SERVICE

On May 23, 2024, I submitted the foregoing Motion for Appointment of Counsel by first class mail to the Clerk of the Court for the 9th District, Northern District of California. Additionally, this motion has been mailed to the following:

Rights Behind Bars
416 Florida Avenue NW
No. 26152
Washington, D.C. 20001

These documents were mailed in accordance with the PRISON MAILBOX RULE on the date listed below.

Respectfully submitted,



John Russell Bellhouse

May 23, 2024

Date:

CERTIFICATE OF SERVICE

On May 23, 2024, I submitted the foregoing Motion for Appointment of Counsel by first class mail to the Clerk of the Court for the 9th District, Northern District of California. Additionally, this motion has been mailed to the following:

Californina Coalition for
Immigrant Justice
1999 Harrison Street
Suite 1800
Oakland, CA 94612

These documents were mailed in accordance with the PRISON MAILBOX RULE on the date listed below.

Respectfully submitted,



John Russell Bellhouse

May 23, 2024

Date:


CERTIFICATE OF SERVICE

On May 23, 2024, I submitted the foregoing Motion for Appointment of Counsel by first class mail to the Clerk of the Court for the 9th District, Northern District of California. Additionally, this motion has been mailed to the following:

Arnold and Porter
3000 El Camino Real
Five Palo Alto Square
Suite 500
Palo Alto, CA 94306

These documents were mailed in accordance with the PRISON MAILBOX RULE on the date listed below.

Respectfully submitted,



John Russell Bellhouse

May 23, 2024

Date:

John Bellhouse 76806-509
Federal Correctional Institution
P.O. BOX 5000
Oakdale, LA 71463-5000

CERTIFIED MAIL®



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RONALD V. DELLUMS FEDERAL BLDG.
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